

0011

**From:** "Galecki, Gregg" <GGalecki@archcoal.com>  
**To:** <ogmcoal@utah.gov>  
**Date:** 3/17/2008 11:45 AM  
**Subject:** Abandoned Equipment - Skyline Mine  
**Attachments:** SCAN 3 13 08 PGS 1-5.pdf; Plate 2.5.pdf

*Incoming  
C/007/0005*

Daron,

I mailed the attached information yesterday. The letter (SCAN 3 13 08) outlines the safety concerns for the abandonment. Plate 2.5 identifies the location of the shields that we hope to get permission to abandon.

We are scheduled for a longwall move in the beginning of May 2008. I hope your scheduling at the Division can accommodate a timely review. Sorry about the short notice, and thanks for your insightful help.

Let me know if you have any questions or comments,

Gregg A. Galecki

Environmental Engineer

Skyline Mines,

Canyon Fuel Company, LLC

(435)448-2636

\*\*\*\*\* Email Disclaimer \*\*\*\*\*

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Canyon Fuel  
Company, LLC  
Skyline Mine

A Subsidiary of Arch Western Bituminous Group, LLC

Gregg Galecki, Environmental Eng.  
HCR 36, Box 380  
Hejper, UT 84526  
(435) 448-2636 - Office  
(435) 448-2632 - Fax

March 13, 2008

Daron Haddock  
Permit Supervisor  
Utah Division of Oil, Gas and Mining  
1594 West North Temple, Suite 1210  
Salt Lake City, Utah 84114-5801

RE: Equipment Abandonment in Coal Lease UTU-67939 of the North Lease area, Canyon Fuel Company, LLC, Skyline Mine, C/007/005.

Dear Mr. Haddock:

Skyline Mine is currently mining in the 2 Left longwall panel on the subject lease. During the mining of the panel, several roof control problems were experienced with the longwall, including two occasions when the longwall had to be shutdown to implement additional roof support to reduce uncontrolled caving. Each time, extreme exposure of personnel to falling roof, heavy lifting, and unfamiliar tasks were experienced during the repairs of the roof. Additionally, there has been a need to modify the mining schedule to allow for running the longwall six days per week to keep up with the poor roof conditions.

Due to the hazards inherent in recovering longwall equipment, especially shields, from a longwall section, Skyline Mine is requesting permission to leave 148 Gullick-Dobson shields in place when mining of the 2 Left section is complete. All other equipment associated with the longwall will be recovered. Prior to leaving the equipment underground, hazardous material will be drained from it when possible.

While mining the 2 Left panel, several shields were damaged, including two which physically broke in half, in the several roof falls which occurred in the panel. (These two shields have been temporarily reconnected but such reconnection exposed maintenance personnel to significant risk of injury while making the fixes.) Examination of the remainder of the shields reveals damage to many of them in the connections between the caving beam and the main canopy, the same failure mode that occurred with the two broken shields. Should poor roof conditions continue in the 3 Left panel, additional unpredicted structural repairs of the shields will further jeopardize personnel.

Section 2.5.2 - Hydrological Impacts of Mining located in the currently M&RP addresses the abandonment of equipment. Plate 2.5.2-1 - Abandoned Mining Equipment Locations (formerly mis-labelled as 2.3.6-3) has been modified to include the equipment currently proposed for abandonment. A copy of the map will also be included in the 2008 Annual report.

Please find enclosed with this letter, modifications to the M&RP which include: 1) Plate 2.5.2-1 Abandoned Mining Equipment Locations (formerly Plate 2.3.6-3; and 2) Page 2.51c of Section 2.5 of the M&RP renaming the Abandoned Mining Equipment Locations plate.

The submittal includes completed C1 and C2 forms, four (4) copies of both clean and redline versions of the text modifications, and two Compact Discs (CD) of the information.

Your prompt consideration of this request would be appreciated. If you have any questions, please call me at (435) 448-2636.

Sincerely,

Gregg A. Galecki  
Environmental Engineer, Skyline Mine  
Canyon Fuel Company, LLC  
enclosures

# APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: Canyon Fuel Company, LLC

Mine: Skyline Mine

Permit Number: C/007/005

Title: Abandoned Equipment

Description, Include reason for application and timing required to implement:

Equipment to be abandoned in the 2 Left Longwal panel.

**Instructions:** If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- |   |   |
|---|---|
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO# _____  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?                                     |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 4. Does the application include operations in hydrologic basins other than as currently approved?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 6. Does the application require or include public notice publication?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 7. Does the application require or include ownership, control, right-of-entry, or compliance information?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV # _____   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies?<br><i>Explain:</i> _____                                   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 11. Does the application affect the surface landowner or change the post mining land use?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)                                |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 15. Does the application require or include soil removal, storage or placement?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 16. Does the application require or include vegetation monitoring, removal or revegetation activities?  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 17. Does the application require or include construction, modification, or removal of surface facilities?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures?  |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 19. Does the application require or include certified designs, maps or calculation?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided?   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 23. Does the application affect permits issued by other agencies or permits issued to other entities?   |

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Wesley K Sorensen  
Print Name

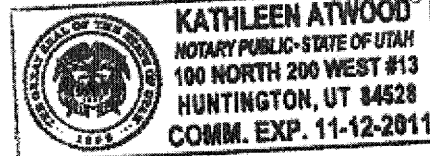
Wesley K Sorensen 3/13/08  
Sign Name, Position, Date

Subscribed and sworn to before me this 13<sup>th</sup> day of March, 2008

Kathleen Atwood  
Notary Public

My commission Expires: 11/12, 2011

Attest: State of Utah } ss:  
County of Carbon



For Office Use Only:

Assigned Tracking  
Number:

Received by Oil, Gas & Mining

# APPLICATION FOR COAL PERMIT PROCESSING

### Detailed Schedule of Changes to the Mining and Reclamation Plan

**Permittee:** Canyon Fuel Company, LLC

**Mine:** Skyline Mine

Permit Number: C/007/005

**Title:** Abandoned Equipment

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

## DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED

[illegible]

Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

Four (4) redline/strikeout and four (4) clean copies of the Table of Contents, and two (2) CDs of all the information.

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the mine has been able to pass its chronic water testing. The Utah Division of Water Quality recently modified the mine's UPDES discharge permit to include a limit of 500 mg/l TDS and no total ton per day limit or the mine would discharge less than 7.1 tons per day of TDS if the water had a TDS concentration greater than 500 mg/l.

A UPDES permit was obtained by PacifiCorp to operate the JC-3 mine dewatering well in James Canyon. This well will discharge high quality mine water to Electric Lake. However, since it is mine water, Skyline will be obligated under SMCRA to assure the quality of the water discharged is within the UPDES permit limits assigned to JC-3. Skyline will submit the required DMRs to the Division as required in Section 2.3.7.

Periodically, due to difficult recovery conditions or roof collapse, mining equipment is abandoned underground. Prior to leaving equipment underground, hazardous materials and lubricating fluids are drained when possible. Since the equipment is steel and not too different compositionally from the roof support throughout the mine, contamination to ground water from abandoned equipment is not anticipated. A map illustrating the location of equipment left underground is provided as Drawing ~~2-3-6-3.2.5.2-1~~. The drawing includes a description of each piece of equipment.

Because of the high alkalinity and low acidity concentrations in the area (differing normally by two orders of magnitude), acid drainage problems do not occur as a result of mining. This is supported by the fact that coal in the area has a low sulphur content.

Skyline Mine anticipates potentially discharging approximately 2,800 gpm of mine water to Eccles Creek after the completion of mining and subsequent abandonment of the 11 Left, 12 Left A and B, and 6 Left B panels in 2004. However, this rate may vary with changes in the operation of JC-3 and because of the steady decline in potentiometric head within the aquifer discharging into Mine #2. Assumptions used in developing the discharge amount can be found in July 2002 Addendum to the PHC in Appendix F.

The water consumed in operating underground equipment, dust suppression, and evaporation is obtained from ground water sources within the mine. These underground water sources are not connected to the surface waters in the area. Extensive research has been performed by the mine to verify that water currently entering the mine is not coming from the surface or depleting surface waters. The recent July 2002 Addendum to the PHC presents data supporting this statement. The

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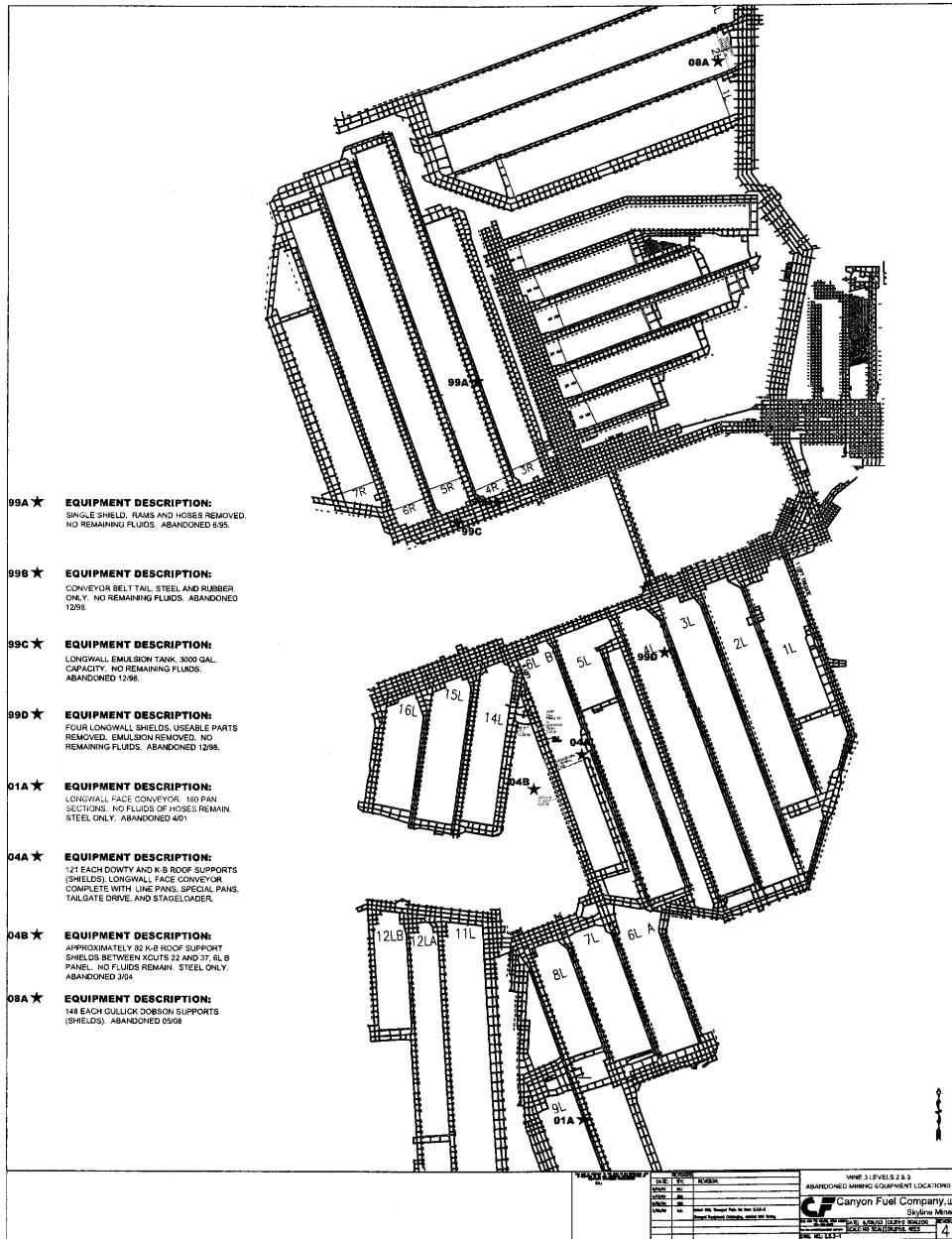
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